

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

CONSTELLATION DESIGNS, LLC,

Plaintiff,

V.

LG ELECTRONICS, INC, LG
ELECTRONICS USA, INC., AND LG
ELECTRONICS ALABAMA, INC.

Defendants.

Civil Action No.: 2:21-cv-00448-JRG

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR EXTENSION OF TIME

Plaintiff Constellation Designs, LLC (“Constellation Designs” or “Plaintiff”) hereby moves the Court for a 95-day extension of the deadline for LG Electronics Inc. (“LGE”), LG Electronics USA, Inc. (“LGUSA”), and LG Electronics Alabama, Inc. (“LG Alabama”) (collectively, “Defendants”) to move, answer, or otherwise respond to Plaintiff’s Complaint. Plaintiff filed the Complaint on December 9, 2021 and served LGUSA and LG Alabama on December 10, 2021. LGE has not yet been served through the Hague Convention. The Parties have stipulated and agreed, subject to the Court’s approval, to extend the deadline for Defendants to respond to the Complaint by 95 days, up to and including March 15, 2022. In exchange, LGE has agreed to waive service of process pursuant to the Hague Convention. This agreement between the Parties regarding waiver of formal service does not constitute a waiver of any other rights or defenses described or referred to in Federal Rule of Civil Procedure 12.

Accordingly, Constellation Designs respectfully requests that the time in which Defendants are required to move, answer, or otherwise respond to Plaintiff's Complaint be extended 95 days, up to and including March 15, 2022.

DATED: January 4, 2022

Respectfully submitted,

/s/ Melissa R. Smith (with permission)

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**ATTORNEYS FOR PLAINTIFF
CONSTELLATION DESIGNS, LLC**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel registered as Filing Users on this 4th day of January 2022.

/s/ Jason D. Cassady
Jason D. Cassady

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Plaintiff met and conferred with counsel for Defendants pursuant to Local Rule CV-7(h). Counsel for Defendants indicated that it is unopposed to this motion.

/s/ Jason D. Cassady
Jason D. Cassady